



UNIVERSITY of DENVER

Department of Athletics and Recreation

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

April 11, 1994

BY HAND

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554


Re: PP Docket No. 93-21  
Sports Migration Inquiry

Dear Mr. Caton:

Transmitted on behalf of the University of Denver are an original and nine copies of the its Further Comments in the above-referenced proceeding. We would appreciate your assistance in distributing a personal copy of the University of Denver's Further Comments to each Commissioner.

Thank you for your assistance in this matter.

Sincerely,

  
Diane T. Wendt  
Associate Director  
Athletics and Recreation

DTW/rjh

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Department of Athletics and Recreation

**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Implementation of Section 26 of the  
Cable Television Consumer Protection  
and Competition Act of 1992

Inquiry into Sports Programming  
Migration

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)  
) PP Docket No. 93-21  
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**FURTHER COMMENTS OF THE UNIVERSITY OF DENVER**

The University of Denver ("University") submits these comments in response to the Commission's Further Notice of Inquiry ("Further Notice") in this proceeding. Rules which would unreasonably restrict cable coverage of sports events would adversely affect the University and its athletic programs because broadcast television stations and networks generally have not been willing to televise sports events involving University teams.

As the University explained in its Comments submitted on March 29, 1993, in response to the Commission's initial Notice of Inquiry ("NOI") in this proceeding, Prime Sports Network - Rocky Mountain ("PSN-RM"), a regional cable sports network, has provided cable coverage of numerous sports events featuring University teams, including University hockey games and gymnastics events. PSN-RM also televises a variety of sports events produced by the Colorado Athletic Conference, including games involving the University men's and women's basketball teams and the women's volleyball team.

PSN-RM has provided the only real television exposure for University sports teams, because broadcast stations and networks generally have not been interested in televising University sports events. Even where the coverage of certain sports events was independently produced (for example, the University independently produced the coverage of two gymnastics events) so that broadcasters would incur no production costs in televising those events, broadcasters have not been interested in televising those programs. Consequently, our initial comments in this proceeding concluded that the University and television viewers interested in University sports events are better off under the current mix of broadcast and cable sports events because at least some events featuring University sports teams -- which would not otherwise be available on broadcast television -- are available regionally on PSN-RM and occasionally PSN-RM's coverage of these events is picked up for national cable distribution by Prime Network.

The University submits these Further Comments to address two issues raised in the Commission's Further Notice. First, the Commission asks why cable coverage of sports events has increased more significantly than broadcast coverage. See Further Notice at ¶¶ 13-14. Our experience indicates that because regional programming services like PSN-RM are dedicated exclusively to sports, they are willing and able to televise a variety of sports events which broadcasters have never televised. As a result, the University and its athletic teams have gotten regional, and sometimes national, television exposure which it has never been able to obtain from broadcast stations or networks.

Second, the Commission has invited comment on other "relevant topics not specifically identified in the Further Notice". See Further Notice at ¶ 17. The University respectfully submits that the Commission should not overlook the substantial and tangible benefits which result from the television exposure provided by PSN-RM and Prime Network coverage of University sports events. University hockey games have been televised by PSN-RM and Prime Network throughout the United States and Canada, generating significant interest in the school on the part of prospective students and student-athletes. It would be virtually impossible to obtain such wide-spread exposure for a University hockey game on broadcast television.

Cable coverage of University sports events also has facilitated certain fund-raising efforts among University alumni. For example, the University organized alumni gatherings at sixteen different locations across the country in conjunction with the live cable coverage of the University of Denver v. Colorado College hockey game on March 4. These events -- which afford a unique opportunity for the University to communicate with alumni and to cultivate ongoing financial support for the school -- simply would not be possible if they depended on broadcast coverage of University sports events.

In sum, cable coverage of University sports events has yielded significant benefits to the University and has not come at the expense of broadcast coverage. Regulations which would unreasonably restrict cable coverage of sports events would adversely affect the University and television sports fans alike.

Respectfully submitted,

April 11, 1994

THE UNIVERSITY OF DENVER

By



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